

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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STEPHEN M. WILSON, <i>et al.</i> ,	:	<u>Filed Electronically</u>
	:	
Plaintiff,	:	Docket No. 07 Civ. 6176 (LTS)
vs.	:	
	:	
IMAGESAT INTERNATIONAL N.V., <i>et al.</i> ,	:	<b>ORAL ARGUMENT REQUESTED</b>
Defendants.	:	

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that Defendant ImageSat International N.V. (“ImageSat”), by its undersigned attorneys, upon (i) the Joint Memorandum of Law in Support of Motion to Dismiss on Behalf of Defendants ImageSat, Israel Aerospace Industries Ltd., Elbit Systems Ltd., Moshe Keret, Izhak Nissan, Jacob Weiss, Shimon Eckhaus, Gino Piperno-Beer, David Arzi, Yoav Chelouche, Michael Federmann, Estate of Jacob Toren, Joseph Ackerman, Joseph Gasper and Yehushua Eldar (“Joint Mem.”); (ii) the Memorandum of Law on Behalf of ImageSat; (iii) the Declaration of Deborah Elman and the exhibits attached thereto; (iv) the Declaration of Professor Peter van Schilfgaarde; (v) the Declaration of Dror Vigdor; (vi) the Declaration of Hagai Goren, and all other pleadings and proceedings herein, will move this Court before the Honorable Laura Taylor Swain, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10017-1312, at a time and date to be set by the Court, for an Order pursuant to Rules 9(b), 12(b)(1), 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint with prejudice, and granting such other relief as the Court deems proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to Rule 2(b) of the Individual Practices of the Honorable Judge Laura Taylor Swain, undersigned counsel certifies that they conferred with Plaintiffs' counsel on September 7, 2007, and on several other occasions, using their best efforts to resolve or narrow the issues raised in ImageSat Motion to Dismiss the Complaint, but these efforts were unsuccessful.

Dated: New York, New York  
October 15, 2007

Respectfully submitted,

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